



PHOTO
#3.3
sc 002.jpg

North Wall Core: Core taken from north wall for material evaluation.



PHOTO
#3.4
sc 004.jpg

South Wall, Core at Line 40: Core taken at Line 40 for materials evaluation.

VIL_RESP02234



PHOTO
#3.5
1019 026.jpg

West side Building Concrete Beam below slab: Note spalled concrete and exposed steel rebar. Concrete repairs will be significant under this slab.



PHOTO
#3.6
1019 014.jpg

Underside of slab near Grid Line 43 and Grid Line B. Though not visible, small cracks exist along the length of many of the interior beams.

VIL_RESP02235



PHOTO
#3.7
923 045.jpg

B-Line Grade Beam, Looking East toward Line 40: Anchors that supported slab formwork are visible; Grade Beam visible at right.



PHOTO
#3.8
923 010.jpg

West End, Looking from Line D to Line C near Column Line 43: Note Shallower water depth, this area.

VIL_RESP02236



June 30, 2004

Ms. Renee J. Lewis
50 Monument Square, 2nd Floor
Portland, Maine 04101

RE: 13 Depot Street, Windham, Maine
Jacques Whitford Project No. mep04127

Dear Ms. Lewis:

Jacques Whitford Company, Inc. (Jacques Whitford) is pleased to provide this letter to further clarify uncertainties associated with our recent investigation at the 13 Depot Street site. As you are aware, our investigations identified gasoline impacted soil approximately 50 feet down slope from a former underground gasoline storage tank. While field evidence indicates the impacted soils may be localized and only moderately impacted, further investigation and review by the Maine Department of Environmental Protection (DEP) will be necessary to determine the nature and scope of any future clean-up action.

Clean-up guidelines for petroleum-impacted sites are published by DEP. Based on these guidelines and our knowledge of the site, we have characterized the site as "Baseline-2." Under Baseline-2 clean up standards, soils at the site would require clean up to 500-1000 parts per million (ppm) using a field screening instrument. More stringent, "Intermediate" clean up standards could be imposed by DEP if they believe area water supplies are at risk from the site. As we note in our report, three private wells are reported to exist within 1,000 feet of the site, even though public water supply is available. Further, DEP could require a potentially costly groundwater investigation if they seek confirmation that free-phase petroleum product does not exist on the water table.

In light of these uncertainties, we recommend that any business transaction associated with this property include adequate time for DEP review of existing environmental reports to better define future actions at the site. The timetable should also allow for completion of additional investigation, if deemed necessary, to qualify environmental risk. It is important to note that the investigations conducted at the site to date have been preliminary in nature, and have not necessarily identified all environmental concerns at the site.

Sincerely yours,
Jacques Whitford Company, Inc.

J. Todd Coffin
D. Todd Coffin, C.G.
Project Manager



VIL_RESP02237

**PHASE I AND II
ENVIRONMENTAL SITE ASSESSMENTS
Former Depot Energy Company
13 Depot Street, Windham, Maine**

Prepared for:

Ms. Renee Lewis
50 Monument Square, 2nd Floor
Portland, Maine 04101

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Jacques Whitford Project No. MEP04127

June 17, 2004

EXECUTIVE SUMMARY

Jacques Whitford conducted Phase I and II Environmental Site Assessments (ESAs) at 13 Depot Street, Windham, Maine (the "Subject Site"). The Subject Site is located on the southern side of Depot Street adjacent to Maine Central Railroad tracks approximately 300 feet west of High Street.

The Subject Site is designated by the Windham Assessor's Office as Map 38, Lot 6 and is approximately 40,850 square feet. The site is currently zoned as Industrial (I). The Subject Site is improved with a one-and-a-half story, wood frame garage, a one-and-a-half story wood frame former railroad station, a one story wood-frame storage/residential building resting on concrete piers, two steel railroad box cars with wood floors, one 10,000-gallon railroad tank car, and an in-ground scale.

We observed a 55-gallon drum labeled oil and another labeled antifreeze, numerous unmarked closed 5-gallon containers, unlabelled open containers apparently containing petroleum, automotive gasoline tanks containing petroleum, and empty 55-gallon drums (one marked corrosive). We also observed numerous automobile transmissions, engines, automotive batteries, 25-30 junked automobiles, other automotive parts, and miscellaneous debris piles on the subject site. Residual petroleum was observed in the tank car.

According to the Portland Water District, the Subject Site has been serviced by municipal water since 1948. A sewerage lift station was observed at the site. According to a former owner, Merrill Lasky, the septic/lift station pumps effluent from the bathroom in the garage and the bathroom in the storage building to the municipal sewer in Depot Street.

One floor drain was observed in the garage. Staining and an open container of petroleum was observed near the drain. Mr. Lasky indicated that the drain discharged directly to the subsurface under the building. We observed a PVC outfall pipe discharging to a drainage ditch at the adjoining mill property near the Subject Site's southerly property line. Mr. Lasky believed this outfall pipe drained the subsurface area near the in-ground scale.

Jacques Whitford utilized the services of Environmental Data Resources, Inc. to perform a search of federal and state environmental databases for sites of potential environmental concern within applicable ASTM radii. The Subject Site was identified on the EDR, Inc. database as a UST and LUST site. No other sites likely to impact the Subject Site were identified. Likewise, no sites of environmental concern were identified during review of records from the Windham Fire Department, Windham Building Department, Windham Historical Society, Windham Assessor's Office, or Maine Historical Society.

Due to the age of buildings and subsequent renovations, suspect asbestos-containing materials (ACMs) and lead-based paint may exist in the on-site building. We also observed possible ACM insulation between the inner and outer steel layers of the railroad tank car at the site.

Jacques Whitford reviewed a previous consulting report for the site written in connection with the removal of a 500-gallon underground gasoline tank from the site in 1993. The report,

prepared by Acadia Environmental, indicated a release from the UST. Acadia measured a level of 591 ppm with a photoionization device in black soil at 3-4 feet below ground surface and found a TPH level of 77 mg/Kg in the soil.

Based on the results of the Phase I ESA, Jacques Whitford conducted a Phase II ESA at the site. We oversaw the installation of test pits and collected soil samples for bag headspace screening with a PID and chemical testing. Most of the PID results were less than 200 ppm. Two samples from one testpit near the former UST grave tested greater than 1,000 ppm with the PID. No elevated PID readings were observed in surface soil or in floor drain sediment.

Jacques Whitford submitted three test pit soil samples and five surface soil or sediment samples to Spectrum Analytical of Agawam, Massachusetts for testing of volatile organic compounds, gasoline range organics, PCBs, and/or the 8 RCRA metals. Elevated levels of gasoline constituents were detected in a sample downgradient of the former gasoline UST (TP-4); however, concentrations did not exceed the Maine Department of Environmental Protection (MDEP) Table 4 Residential Soil Criteria. The only exceedences recorded were of arsenic, which at 12.8 and 15.6 mg/kg, exceeded the 10 mg/kg Table 4 residential standard.

Based on the information gathered and on observations made during this investigation, the Phase I and II ESAs have revealed evidence of recognized environmental conditions associated with the Subject Site. Jacques Whitford concludes the following:

1. Gasoline contaminated soil was encountered at the site in 1993 during removal of a gasoline UST; the removal was monitored by Acadia Environmental Technology. MDEP was notified of the findings and no further action was required. The recent investigation by Jacques Whitford identified gasoline-impacted soils down slope from the former tank. The concentration of residual gasoline in the soils exceeded the MDEP Baseline-2 standard.
2. A floor drain was observed in the garage building. According to a former owner, the drain discharges directly to the subsurface below the garage. The drain was located near an open container of petroleum and floor staining. No high PID readings or PCBs were detected in sediment in the floor drain. Nevertheless, petroleum products could have been discharged over time and released to the subsurface beneath the building. As a solid surface existed at the bottom of the drain and due to the surrounding concrete floor, collecting a subsurface soil sample in the vicinity of the drain was not performed during this phase of work.
3. While oil staining was apparent on the ground surface around stored parts and machinery on site, field observations during test pitting, PID screening and lab testing of soils suggests that the staining is relatively localized..
4. Of the 8 RCRA metals tested at two surficial soil sampling locations, only arsenic exceeded the MDEP's residential soil criteria. This arsenic may be naturally occurring.
5. Jacques Whitford observed suspect ACM and lead-based paint in building materials and in insulation between the walls of the 10,000-gallon aboveground storage tank (AST) at the site.

Clean-up decision tree

Based on the evidence of recognized environmental conditions associated with the Subject Site, Jacques Whitford recommends the following:

1. Completion of an asbestos survey if proposed or future renovation or demolition activities will impact suspect ACMs at the Subject Site.
2. Completion of concrete coring and hand augering adjoining the garage floor drain. Collection of soil samples for PID screening and analytical testing for appropriate parameters.
3. Submission of this report and any follow-up testing to the MDEP Voluntary Response Action Program (VRAP) as a first step in obtaining a "No Action Assurance Letter."
4. With MDEP concurrence, removal of petroleum contaminated soil with PID readings that exceed the MDEP Baseline-2 standard. Soil removal should be preceded by investigation of the extent of impacted soils in the vicinity of the former UST (*e.g.*, geoprobes or additional test pits).
5. Preparation and submission of a clean-up report to MDEP to establish "closure" status for the site and associated impacted soils identified, as well as to support the VRAP process.

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1.0 INTRODUCTION

Jacques Whitford Company, Inc. (Jacques Whitford) was contracted by Renee J. Lewis to complete Phase I and II Environmental Site Assessments (ESA) of the property located at 13 Depot Street, Windham, Maine, hereinafter referred to as the "Subject Site." A Site Location Map (Figure 1) and a Site Plan (Figure 2) showing the Subject Site location and depicting general site characteristics are presented in **Appendix 1** of this report. The Phase I ESA was prepared in general accordance with the American Society of Testing and Materials (ASTM) E 1527-00 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process). These Phase I and II ESAs were conducted in accordance with Jacques Whitford proposals dated April 26, 2004 and May 12, 2004. These proposals were authorized by Renee J. Lewis. The Phase I and II ESA objectives, scope, and limitations are presented in the following sections.

1.1 Objective

The objective of the site investigation was to identify actual or potential *recognized environmental conditions* associated with the Subject Site, which may exist as a result of current or historical activities conducted on the Subject Site or on adjoining properties. The term recognized environmental conditions, as outlined in ASTM 1527, means "The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

Additionally, the purpose of the environmental assessment was to permit the user to satisfy one of the requirements to qualify for the innocent landowner defense to Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) liability.

1.2 Scope of Work

The Phase I ESA completed by Jacques Whitford consisted of the following:

- Municipal and State Records review;
- Interviews with regulatory officials, local officials, and personnel associated with the Subject Site and neighboring properties;
- A Subject Site visit; and,
- Evaluation of information and preparation of this report.

The Phase II Scope of Work conducted by Jacques Whitford consisted of the following:

- Identification of testpit locations, evaluation of excavator access and obtaining Dig-Safe utility clearance;
- Conducting a one-day testpitting program that focussed on areas of concern identified by the Phase I ESA;
- Conducting Photoionization Detector (PID) screening for the presence of volatile organic compounds (VOCs) from each test pit;
- Submitting soil samples for chemical analysis to evaluate the presence of VOCs, metals, PCBs, and GRO from locations of stained soil on the Subject Site, soil from the floor drain located in the garage, and soil from test pits with elevated PID readings; and,
- Evaluation of information and preparation of this report.

Selected photographs taken by Jacques Whitford during the site reconnaissance are presented in **Appendix 2** of this report. Resource contact information and relevant Subject Site information are presented in **Appendix 3**. Educational and professional experience summaries for the Jacques Whitford personnel responsible for this assessment and report preparation are presented in **Appendix 4**. A copy of the federal and state environmental database search assembled by Environmental Data Resources, Inc. is attached as **Appendix 5**. Test pit exploration logs are contained in **Appendix 6**, and analytical laboratory reports are contained in **Appendix 7**.

1.3 Limiting Conditions

The Subject Site and readily visible and publicly accessible portions of adjoining properties were examined for the presence of actual or potential recognized environmental conditions. The only area inaccessible to Jacques Whitford was the roof of each building. Neighboring properties were viewed from publicly accessible areas.

Historical information sources researched in this assessment allowed uses of the property to be traced from the present back to 1922, when the Subject Site was apparently used as a residence and general store. Site use could not be determined back to a time when the site was undeveloped land, thereby constituting historical data failure per ASTM Standard E 1527-00.

1.4 Limitations of the Assessments

This Phase I and II ESAs were prepared in accordance with the Scope of Work described in Section 1.2. The work conducted by Jacques Whitford is limited to the services agreed to with Renee J. Lewis, and no other services beyond those explicitly stated should be inferred or implied.

Jacques Whitford's Phase I ESA is limited to visual observations of Subject Site conditions on the day inspected; review of readily available and relevant data; and statements made and information provided by the client, their agents, outside parties, and regulatory agencies. Jacques Whitford has exercised due and customary care in the conduct of its assessment, but in cases where it was not reasonably ascertainable, information provided by others was not independently verified.

The Phase I ESA is a limited and non-exhaustive survey that is intended to evaluate whether readily available information indicates that the historic or current use of the Subject Site resulted in contamination by petroleum products or hazardous substances. As a result, without a comprehensive sampling and analysis program or implementation of services beyond the original scope of work, certain conditions, including but not limited to those summarized below, may not be revealed:

- Naturally occurring toxic substances or elements found in the subsurface soils, rocks, or water;
- Toxic substances commonly found in current habitable environments, such as stored household products, building materials, and consumables;
- Biological or infectious agents or pathogens;
- Contaminant plumes (liquid or gaseous) below the surface from a remote or unknown source;
- Contaminants or conditions that do not violate current regulatory standards, but may violate such standards in the future; and,
- Unknown, unreported, or not readily visible site contamination.

Some of the information presented in this report was provided through existing documents and interviews. Although attempts were made, whenever possible, to obtain a minimum of two confirmatory sources of information, Jacques Whitford in certain instances has been required to assume that the information provided is accurate.

The conclusions presented represent the best judgement of the assessor based on current environmental standards and on the site conditions observed on May 7, 2004. Due to the nature of the investigation and the limited data available, the assessor cannot warrant against undiscovered environmental liabilities.

Should any conditions at the site be encountered which differ from those observed, we request that we be notified immediately in order to assess the additional information and its effects on the above conclusions.

This report has been prepared for Renee J. Lewis, and it should be emphasized that conditions at the Subject Site can change over time. The use of this report by third parties shall be at their own risk.

2.0 ENVIRONMENTAL SETTING

Environmental characteristics including topography, geology, and hydrogeology were evaluated based on Subject Site observations, published literature and maps, and readily available public information.

2.1 Topography

The surface topography of the Subject Site slopes slightly downward from the northeast to the southwest with a regional topography sloping gradually downward to the southwest. The Subject Site is located approximately 130 feet to 120 feet above mean sea level (msl).

2.2 Surface Water and Drainage

As depicted on Figure 1 and Figure 2, there were no naturally occurring surface water bodies on the Subject Site. A drainage ditch was observed near the southern and western borders of the Subject Site. The ditch apparently drains into a catch basin southwest of the site.

During the site reconnaissance a discharge pipe was observed in the wall of the drainage ditch near the southern border of the site. According to former Subject Site owner Merrill Lasky, the pipe drains the subsurface in the area of a scale near the west wall of the warehouse building.

According to a Flood Insurance Rate Map, Panel Number: 2301890025B, the Subject Site is not located within the 100-year or 500-year flood zones.

2.3 Wetlands

No obvious evidence of wetlands or wetland vegetation was observed on the Subject Site during the site reconnaissance.

2.4 Geology/Soils

According to the EDR report, bedrock geologic units in the area of the Subject Site consist of eugeosynclinal deposits of Devonian and Sularian-age rocks. No outcrops were observed on the Subject Site. During test pitting, Jacques Whitford encountered suspect bedrock from approximately 2 feet to 8 feet below ground surface.

Based on a review of USDA Soil Conservation Service information provided by EDR, the soil types found in the area of the Subject Site include Scantic silt loam. Scantic soils exhibit poor drainage with very slow infiltration rates. Scantic soil (Presumpscot Formation clayey silt) was observed during Phase II testpitting at the site (see Section 4.2.1).

During test pitting, groundwater was not observed with the exception of three pits where minimal groundwater seepage was encountered. This groundwater appeared to be in a perched condition.

2.5 Groundwater

Based on the United States Geological Survey (USGS) Topographic Map for Portland West, Maine (1994, 1:24,000), shallow groundwater is interpreted to flow southwest toward the Presumpscot River. The groundwater table was not encountered in the test pits excavated at the site.

3.0 PHASE I ESA

3.1 Site Investigation

Information concerning the Subject Site was obtained during the site reconnaissance conducted by Mr. David Chapman and Mr. Aaron Martin of Jacques Whitford on April 29, 2004, during interviews with representatives familiar with the Subject Site, and through review of the documents referenced in this report. Selected photographs of the Subject Site and building taken during Jacques Whitford's site visit are provided in **Appendix 2**.

3.1.1 Site Description and Use

The Subject Site is designated by the Town of Windham Building Department as Map 38, Lot 6 and is approximately 40,850 square feet. The ground surface is improved with an approximate 375 square-foot concrete parking area and an approximate 1,500 square-foot bituminous concrete (asphalt) parking area located adjacent to the former railroad station (refer to Figure 2). The remainder of the parking area has a gravel and sand surface.

As shown of Figure 2, the Subject Site contains three buildings; a former railroad station, a garage, and a warehouse. The Subject Site also contains a 10,000-gallon railroad car used as an aboveground storage tank (AST), two railroad box cars and an in-ground scale. One unused aboveground hydraulic hoist was located next to the northern boxcar.

The site perimeter is bordered by an earthen embankment with trees and shrubs leading down to a drainage ditch that flows adjacent to the southern and western boundaries of the property. The entire embankment is littered with wood, concrete, automotive, and miscellaneous debris piles. Twenty-five to thirty abandoned automobiles were observed in the parking lot of the Subject Site.

A summary of building information is presented in Table 1 below.

Table 1 – Summary of Lot and Building Information	
Property	
Area	Approximately 40,850 square feet
Buildings	
Area (square feet)	Garage: approximately 1,400; warehouse: 3,240; former railroad station: 994
Services: Sewer, Water, Electricity, Natural gas, Telephone	According to Merrill Lasky, a former owner, sewerage services are provided by the Portland Water District. Water services are provided by the Portland Water District. Electricity is provided by Central Maine Power.
Floor Drains	One floor drain was observed in the garage building.
Lighting	Fluorescent and incandescent.
Number of Stories	Garage: 2 stories; warehouse: 1 story; former train station: 1.5 stories.
Foundation	Garage and former train station: concrete slab; warehouse: concrete piers;
Basement	None. The warehouse has an enclosed crawl space under the northern portion of the building and an open storage space under the southern portion of the building.
Roof	Wood frame with shingles or metal covering.
HVAC	The warehouse building is heated with an oil-fired forced-hot-water boiler. The garage building is heated with an oil furnace and with hot water from the warehouse heating system. The former railroad station is not heated

The 1,320 square-foot garage is constructed on a concrete slab with no basement in the southeast corner of the Subject Site. The building is in poor condition and contains one known floor drain. Building improvements include electricity, hot-water plumbing connected via the warehouse oil furnace, a bathroom, an oil furnace connected to a 275-gallon AST with fill and vent pipes, an overhead hot water heater, and fluorescent lighting (with ballasts that may contain PCBs). The second floor is currently being used as storage for miscellaneous materials.

The second building at the site, a 994 square-foot former railroad station, sits on a concrete slab with no basement. The building is in poor condition. Insulation between the building walls consists of coal or charcoal. Building improvements include electricity and fluorescent lighting that may contain PCBs. The building currently is used as storage for automobile transmissions and other automobile engine parts along with miscellaneous items such as compressed gas cylinders.

The 3,420 square-foot warehouse and residence was constructed on concrete piers in 1960 along the eastern edge of the Subject Site. The building is in good condition. The building is partitioned into an apartment in the northwestern half of the building and mini-storage throughout the remainder of the building. Building features include plumbing, an oil-furnace

connected to a 275-gallon AST in the locked storage room under the building, electricity, and fluorescent lighting (with ballasts that may contain PCBs). The warehouse is currently used as an apartment and for storage of automotive parts and miscellaneous items.

The two steel-walled, wooden-floor, railroad boxcars are each 410 square-feet in size (refer to Figure 2). They are in poor condition and were moved to their current location in 1984 on the western side of the Subject Site. They are aligned parallel to each other and their longer sides face north and south, separated from each other by about twenty feet. They are currently being used as storage for automotive engines, transmissions, and other miscellaneous materials.

The 10,000-gallon steel AST was installed in 1983 between the former depot station and the southern railroad boxcar on the western edge of the Subject Site (Figure 2). It is constructed on a steel frame with a concrete foundation, and it is used to store #2 fuel oil. The AST is surrounded on all sides by an earthen berm. There was no indication of prior spills or leaks and the tank appeared to be in good condition.

The 240 square-foot concrete scale is located adjacent to the warehouse on the western side and apparently is drained via a discharge pipe that discharges into the drainage ditch at the southeastern border of the Subject Site.

3.1.2 Pits, Ponds, Lagoons

No pits, ponds, or lagoons were observed on the Subject Site during the site reconnaissance.

3.1.3 Water Wells

No on-site water supply wells or groundwater monitoring wells were observed during Jacques Whitford's inspection of the Subject Site. Potable water has been supplied to the subject site by the Portland Water District since 1948. Three water wells are located on private properties less than 1,000 feet from the Subject Site. The Boulanger water well is located 575 feet north of the Subject Site; the Georgatos water well is located 450 feet northeast of the Subject Site; and the Reed water well is located 600 feet east of the Subject Site. These wells are situated at an elevation between 10 and 20 feet higher than the Subject Site. Public water is available to all three properties.

3.1.4 Above and Underground Storage Tanks

Jacques Whitford observed one 10,000-gallon AST and two 275-gallon ASTs (refer to Figure 2). Residual oil was observed in the 10,000-gallon AST. The two 275-gallon tanks are currently in use. EDR indicated that one 550-gallon UST was removed near the northwest outside corner of the garage (southeast portion of site).

Jacques Whitford reviewed records maintained by the Town of Windham Building Department. The file contained information indicating that the 550-gallon UST was used for storage of gasoline, and the 10,000-gallon AST was used for storage of #2 fuel oil. The records noted the tanks were

installed in 1983. The 550-gallon UST was subsequently removed from the site in 1993 (refer to Section 3.5).

3.1.5 Material Storage

Drums and Containers

Jacques Whitford observed a 55-gallon drum labeled oil, a 55-gallon drum labeled corrosive, and another labeled antifreeze. These drums appeared to be in good condition and they were stored on the concrete parking lot. There was no apparent staining or leakage originating from the drums.

We observed numerous unmarked closed 5-gallon containers, unlabelled open containers apparently containing petroleum, automotive gasoline tanks containing petroleum, and empty 55-gallon drums both outside on the property and inside all three buildings and box cars.

We observed three 55-gallon drums on the property to the east across the railroad tracks. The drums were observed on the soil, laying on their sides. Refer to photograph 14 of Appendix 2 for a picture of the 55-gallon drums on the adjoining property to the east.

Waste and Scrap Material

Jacques Whitford observed numerous automobile transmissions, engines, automotive batteries, other automotive parts, and miscellaneous debris piles inside all three buildings, inside the boxcars, and stored on the soil at the Subject Site. Apparent oil staining was observed on the concrete floors, boxcar floors, and on soil in the majority of areas where these parts were stored. The automotive batteries were observed on the concrete floor in the garage. The batteries appeared to be in good condition and no staining or leakage was observed around the batteries.

3.1.6 Spill and Stain Areas

Several petroleum stains were observed on the floors in all three buildings, on the wooden floors inside both boxcars, and on the soil surface at various locations on the Subject Property. The surface soil and floor staining around automotive components and containers is likely a result of repair activities in the garage and storage of automotive parts in the buildings, box cars, and on the Subject Property. Refer to photographs 10, 11, and 12 of Appendix 2 for pictures of staining surrounding automotive components.

3.1.7 Wastewater Discharges

One six-inch diameter, circular, floor drain was observed in the garage. Staining was noted on the concrete floor near the drain. No obvious chemical odors were noted in the drain. In a telephone interview on May 7, 2004, Mr. Lasky indicated that the drain discharged directly to the subsurface under the building. For a picture of the floor drain refer to Photograph 13 of Appendix 2. A surface soil sample was collected from sediment in the floor drain and a

headspace PID reading was conducted during the Phase II investigation as discussed in Section 4.

Mr. Lasky said that the sewage from the storage building and garage discharged to a septic/lift station, which conveyed the sewerage to the municipal sewage system. Mr. Kittrell, property owner, when interviewed on April 29, 2004, said he knew of no leachfields at the site.

We observed a PVC outfall pipe discharging to the drainage ditch at the adjoining mill property near the Subject Site's southerly property line. Mr. Lasky believed this outfall pipe drained the subsurface area near the in-ground scale west of the warehouse.

3.1.8 Polychlorinated Biphenyls (PCBs)

One pole-mounted transformer, which may contain PCBs, was observed near the northeast corner of the Subject Site. No evidence of leaks or staining was observed. The former railroad station, warehouse, and garage all contain fluorescent lighting, and due to the age of the buildings, PCBs may be present within the fluorescent lighting components. Two aboveground hydraulic lifts were observed in the garage. No evidence of leaks or staining was observed immediately beneath the hydraulic lifts. One hydraulic lift was observed near the northwest boxcar. Evidence of leaks or staining was observed on the soil around the hydraulic lift. A surface soil sample was collected near the hydraulic lift to determine the presence of PCBs (see Section 4.0). For a picture of the hydraulic lift near the boxcar, refer to Photograph 5 of Appendix 2.

3.1.9 Asbestos-Containing Materials (ACM)

Neither an exhaustive asbestos survey nor testing for ACMs was performed as part of this assessment. Based on the age of the Subject Site buildings (prior to 1980) certain building materials may contain ACMs. Suspect ACMs included floor tile, mastic and wallboard. Potential ACM was also observed between the inner and outer walls of the 10,000-gallon AST (railroad car).

3.1.10 Lead Paint

Based on the age of the Subject Site buildings (prior to 1978), lead-based paint may be present. Painted surfaces appeared to be in good to poor condition.

3.1.11 Hydraulic Lifts and/or Elevators

No evidence of subsurface hydraulic lifts or elevators was observed on the property during the site reconnaissance. Two aboveground hydraulic lifts were observed inside the garage. One was observed outside near one of the boxcars. For a picture of the hydraulic lift near the boxcar, refer to Photograph 5 of Appendix 2. Staining was noted on the soil near the outside lift.